



Phillip Kim  
pkim@rosenlegal.com

June 4, 2021

**VIA ECF**

District Judge Joan M. Azrack  
United States District Court  
Eastern District of New York (Central Islip)  
100 Federal Plaza  
Central Islip, New York 11722

Re: *Paradis v. Multiplan Corporation f/k/a Churchill Capital Corp. III, et al.*,  
Case No. 2:21-cv-01853-SJF-ARL

Dear Judge Azrack:

My firm represents Movant Steve Kong (“Movant”) in the above-referenced securities class action. Movant is submitting this letter to respectfully request that the Court vacate its order dismissing the case and reopen the case. *See* Dkt. No. 13.

As a brief background, Plaintiff Samuel Paradis (“Plaintiff”) filed the instant action on April 6, 2021. *See* Dkt. No. 1. That same day, Plaintiff issued an early notice, pursuant to the Private Securities Litigation Reform Act of 1995 (“PSLRA”), 15 U.S.C. § 78u-4(a)(3)(A), which advised class members of the pendency of the action, the allegations and claims in the complaint, the Class Period, and that investors would until June 7, 2021 to move for appointment as lead plaintiff. *See* Dkt. No. 10-1. On April 26, 2021, Movant filed his motion for appointment as lead plaintiff and approval of selection of lead counsel. *See* Dkt. No. 7.<sup>1</sup>

But before other investors could move for lead plaintiff, Plaintiff voluntarily dismissed the case on June 3, 2020. *See* Dkt. No. 12. However, Movant, as an interested party, was never consulted or given the chance to object to the dismissal. Moreover, other investors have not had the opportunity to move for appointment as lead plaintiff, as the deadline to move for lead plaintiff is June 7, 2021.

---

<sup>1</sup> On May 4, 2021, Plaintiff filed a notice with the Court advising of the new PSLRA lead plaintiff deadline of June 7, 2021. The original deadline was April 26, 2021, based on the commencement of two actions filed in the SDNY, but Plaintiff stated that the new deadline applied because the two SDNY actions were voluntarily dismissed prior to the original lead plaintiff deadline. In those cases, however, no lead plaintiff motions had been filed at the time of dismissal. Here, Mr. Kong has made a lead plaintiff motion and is a party to the case.

Therefore, Movant respectfully requests that the Court vacate its Order dismissing the case and, instead, dismiss the case as to Plaintiff only. This will allow the lead plaintiff process to move forward and give other investors the right to move for lead plaintiff on June 7, 2021.

We thank the Court for its consideration of this request.

Respectfully,

/s/Phillip Kim

Phillip Kim, Esq.

The Rosen Law Firm, P.A.